

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STEVEN PALANGE,
Plaintiff

v.

MICHAEL B. FORTE, in his official capacity as Chief Judge of the Rhode Island Family Court, **et al.**,
Defendants

C.A. No. 1:19-cv-00340-JJM-PAS

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S OBJECTION
TO STATE DEFENDANTS' MOTION TO DISMISS**

NOW COME Defendants Hon. Michael B. Forte in his official capacity as Chief Judge of the Rhode Island Family Court (“Chief Judge Forte”), Jean Maggiacomo in her official capacity as Deputy Clerk of the Rhode Island Supreme Court, Courtney E. Hawkins in her official capacity as Director of the Rhode Island Department of Human Services, Hon. Sandra Lanni in her official capacity as an Associate Justice of the Rhode Island Family Court (“Associate Justice Lanni”), Peter F. Neronha in his official capacity as the Attorney General for the State of Rhode Island, and Ronald Pagliarini in his official capacity as the Chief of Staff of the Rhode Island Family Court (collectively, “State Defendants” or the “State”), and hereby moves for an extension of time up to and including April 16, 2021 to respond to Plaintiff’s Objection to State Defendants’ Motion to Dismiss (ECF 88). The undersigned represents that such an extension is further necessary because of professional obligations in other matters pending in state and federal court. Further, given delays due to COVID-19 related restrictions and current working conditions, additional time is needed to prepare and file a response to Plaintiff’s Objection. This is State Defendants’ first request for an extension.

WHEREFORE, State Defendants respectfully request that this Honorable Court grant their Motion.

Respectfully Submitted,

STATE DEFENDANTS,
By:

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Justin J. Sullivan
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CERTIFICATE OF SERVICE

I hereby certify that on Monday, April 05, 2021 I electronically filed the foregoing document with the United States District Court for the District of Rhode Island by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system:

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/s/Colleen Cole

I hereby certify that on Monday, April 05, 2021 I served a true and accurate copy of the foregoing document on the following parties or their counsel of record by U.S. mail, postage prepaid:

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/s/ Colleen Cole